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October 3, 2021

**VIA ECF ONLY**

Hon. John Michael Vazquez  
United States District Judge  
United States P.O. & Courthouse  
Federal Square  
Newark, New Jersey 07101

**Re: USA v. Andrews, et al.  
Criminal No. 20-578-JMV**

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Dear Judge Vazquez:

On behalf of all counsel in this case, I write to jointly request that the Court approve a new schedule for the filing and briefing of pretrial motions. Pretrial motions currently are due to be filed on October 12, 2021. I have been on trial before Judge Wolfson since the beginning of September and closing arguments are scheduled for this coming week. AUSA Gould is scheduled to commence a three-week trial in later November that will occupy most of his time between now and the conclusion of that trial and, hence, interfere with his ability to respond to any defense motions that are filed in the interim. Therefore, counsel have agreed upon – and seek the Court's approval of – a new schedule under which pretrial motions will be filed on or before December 15, 2021, and the government's opposition will be due on or before February 15, 2021.

Thank you for the Court's consideration of this request.

Respectfully yours,

Mark A. Berman, Esq.

cc: All Counsel of Record (via ECF)

